

RCRA, SUPERFUND & EPCRA CALL CENTER MONTHLY REPORT  
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**1. Generator Accumulation Requirements for Hazardous Waste that is Not Being Shipped Off Site**

*Large quantity generators (LQGs) and small quantity generators (SQGs) may treat hazardous waste on site without obtaining a permit provided they are in compliance with 40 CFR Section 262.34 and all applicable unit standards (e.g., Part 265, Subpart J, if the facility treats in tanks) (51 FR 10146, 10168; March 24, 1986). A LQG decharacterizes 1,500 kilograms of hazardous waste in a tank before discharging it via a Clean Water Act (CWA) permit. Is the generator subject to accumulation requirements in addition to unit standards?*

The LQG would be subject to all applicable accumulation requirements. LQGs that generate hazardous waste on site and subsequently treat or dispose of that same hazardous waste on site are required to follow the generator accumulation requirements in Section 262.34. According to Section 262.10, Note 1, the provisions in Section 262.34 apply to owners and operators who are "shipping hazardous waste generated at their facility." The language in Section 262.10, Note 1, was not intended to exclude waste that is treated or disposed of on site; therefore, all applicable Section 262.34 accumulation requirements apply to these wastes as well.